

**United States District Court
Southern District Of New York**

Melinda Serin, Judson Russ, Long Soui Lim,
Peri Kettler, Gordon Redner, and Thomas J. Smith,
Plaintiffs

v.

Northern Leasing Systems, Inc., Jay Cohen,
Rich Hahn, and Sara Krieger
Defendants

No. 06 CV 1625 (SCR)

Affirmation of Andrey Strutinskiy, Esq.

Andrey Strutinskiy, an attorney duly admitted to the bar of this Court and elsewhere,
being duly sworn, states as follows under penalties of perjury:

1. I am Of Counsel to Chittur & Associates, P.C., attorneys of record for the Plaintiffs abovenamed. I submit this reply affirmation in further support of Chittur & Associates, P.C., fee application.
2. Annexed hereto is the time sheet for the period of December 30, 2010 through February 4, 2011 that I maintained contemporaneously. These are true and accurate records of my time spent on this case, as recorded in my computer with the time software, Amicus Attorney (ver. 5.5.1).¹ These time sheets reflect that I spent 20.1 hours in this case.
3. My current billing rate is \$350 per hour, which is compatible rate for attorneys of my standing in Manhattan. This is the standard rate that Chittur & Associates, P.C., charges to clients whose fee arrangements provide for billing on an hourly basis.

¹Our earlier filing included 2.4 hours on December 30, 2010, and does not include the time in this exhibit.

4. Defendants' objections to my time-recording during the depositions are baseless. As Defendants' counsel is well aware, I functioned at the depositions as both, attorney assisting the deposition and videographer. I was also involved document review and preparation for the deposition.
5. Moreover, my participation also as a videographer for the seven depositions in fact helped to reduce the costs quite substantially. Chittur Aff. fn.3 at 6.
6. While Defendants have raised other objections to my time-entries, they are largely misconceived, as explained in the accompanying papers. To the extent legitimate issues were raised, we have reduced the application by that amount.
7. In view of the aforesaid, the instant fee application should be granted as sought.

Dated: New York, NY
February 4, 2011

Sd/

Andrey Strutinskiy, Esq.

Chittur & Associates, P.C.
Andrey Strutinskiy's Time Entry Report
for Selected File:

Serin

Client ID:

Matter ID:

Thu Dec 30, 2010 to Fri. Feb 04, 2011

Date	Activity	Description	Time (hrs)
Fri Feb 4, 2011		Preparing, finalizing and filing Reply re Fee application	4.80
Thu Feb 3, 2011		Reviewed Defendants' counsel time sheets and opposition papers	1.30
Tue Feb 1, 2011		Finalized and faxed letter to MJ Davison	0.20
Mon Jan 31, 2011		Finalized letter to Judge Gwin	0.80
Wed Jan 26, 2011		Finalized and e- mailed letter re settlement	0.60
Fri Jan 14, 2011		TC w/ KC re settlement and e-mailed docs to him	0.50
Tue Jan 11, 2011		finalized and arranged for deliverery of releses and settlement agreement to Moses & Singer	1.20
Wed Jan 5, 2011		Reviewed Releases	0.20
Mon Jan 3, 2011		Prepared Courtesy copy for MJ of the fee application	1.30
Fri Dec 31, 2010		TC w/ KC re Atty fees ECF filing	0.20
Thu Dec 30, 2010		Fee application preparing and finalizing	9.00
Total Time :			20.10 Hrs.